

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN (Detroit)**

In re:
Regina Cheri Parks

Debtor.

Chapter 13 No. 18-56448-pjs
Hon. Phillip J. Shefferly

OBJECTIONS TO CONFIRMATION

NOW COMES Deutsche Bank National Trust Company, as Trustee, on behalf of the registered holders of First Franklin Mortgage Loan Trust 2006-FF1, Mortgage Pass-Through Certificates, Series 2006-FF1, by and through its attorneys, Trott Law, P.C., and hereby Objects to Confirmation as follows:

1. That Creditor is a holder of a mortgage on real property owned by the Debtor and located at 6036 Jennifer Cres, West Bloomfield, MI 48324-3127;
2. That the mortgage is in material default pursuant to the Creditor's records.
3. That the Debtor's Plan of Reorganization proposes to pay Creditor a regular monthly payment of \$1,281.53 and a pre-petition arrearage of \$39,475.00 at the rate of \$789.50 per month with 0% interest over 50 months;
4. That according to Creditor's records, Creditor must receive the regular monthly payment of \$1,243.07 plus a pre-petition arrearage of approximately \$48,385.40 at the rate of at least \$1,344.03 per month in order for the arrearage to be cured within a reasonable length of time, i.e., 36 months;
5. That the Debtor's proposed Plan of Reorganization understates the pre-petition arrearage and the monthly payment on the pre-petition arrearage;
6. That the Debtor's Plan of Reorganization proposes an unreasonable length of time to cure the pre-petition arrearage, i.e., 50 months;
7. Pursuant to 11 U.S.C. §§ 1322(a)(1) and (b)(5) the Debtors' Plan is underfunded;

Trott Law, P.C.
31440 Northwestern
Hwy
Ste. 145
Farmington Hills, MI
48334-5422
Phone 248.642.2515
Facsimile 248.642.3628

8. Debtor's Chapter 13 Plan cannot be confirmed pursuant to 11 U.S.C. § 1325 as it fails to comply with the requirements of 11 U.S.C. §§ 1322(b)(3) and (b)(5);
9. Creditor objects to the Order of Payment of Claims found in section V(F) of the Plan in the event that the Debtor's attorney elects to receive pre-confirmation compensation pursuant to section III.B.(1)(b);
10. That per the Debtor's schedule I & J, Debtor there is not sufficient income to fund the plan;
11. That Creditor needs to receive adequate assurance/protection that the Debtor will remit all required plan payment as they become due in the form of a future default order;
12. Pursuant to the Creditor's records there is lender placed insurance on this loan;
13. That the Debtor must show proof of valid and acceptable insurance prior to confirmation.

WHEREFORE, Creditor prays that Confirmation be denied, the bankruptcy case dismissed, and for whatever other relief the Court deems just and equitable.

Respectfully Submitted,
Trott Law, P.C.

Dated: January 28, 2019

Trott Law, P.C.
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Farmington Hills, MI
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Facsimile 248.642.3628

Crystal L. Price
/S/ Crystal Price-Buckley (P69921)
Attorney for Deutsche Bank National
Trust Company, as Trustee, on behalf of
the registered holders of First Franklin
Mortgage Loan Trust 2006-FF1,
Mortgage Pass-Through Certificates,
Series 2006-FF1
31440 Northwestern Hwy Ste. 145
Farmington Hills, MI 48334-5422
248.642.2515
Email: EasternECF@trottlaw.com